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January 7, 2025

**E-FILED VIA ECF**

Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
500 Pearl Street, Room 1620  
New York, NY 10007

**Re: Zero Carbon Holdings, LLC et al. v. Aspiration Partners, Inc.,**  
**Civil Action No. 23-cv-5262 (S.D.N.Y.)**

Dear Judge Liman:

The undersigned counsel represents Judgment Creditor Aspiration Partners, Inc. ("Aspiration") in the above-styled matter. Pursuant to Rule 1(C) of Your Honor's Individual Practices, and Rules 37 and 69(a) of the Federal Rules of Civil Procedure in aid of collection of the judgment entered herein on September 20, 2024, Aspiration moves to compel discovery responses from Judgment Debtor Four Thirteen, LLC ("Judgment Debtor"), for the reasons set forth herein.

On September 20, 2024, this Court entered judgment for Aspiration against the Judgment Debtor in the amount of \$522,110.12 (the "Judgment"). On October 7, 2024, Aspiration issued its First Set of Interrogatories to Judgment Debtor (the "Interrogatories") and its First Set of Request for Production of Documents (the "Document Requests") on the Judgment Debtor pursuant to Federal Rule 69(a). Copies of the Interrogatories and the Document Requests are attached hereto as Exhibit 1 and Exhibit 2, respectively.

On October 23, 2024, the Interrogatories and Document Requests were served on the Judgment Debtor through its registered agent in Wyoming. The Returns of Service are attached as Exhibit 3. Judgment Debtor's responses to the Interrogatories and the Document Requests were due on or before November 22, 2024. Judgment Debtor failed to respond to the Interrogatories and Document Requests.

On December 13, 2024, the undersigned counsel contacted counsel for the Judgment Debtor to confer regarding the failure of the Judgment Debtor to respond to the Interrogatories

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and Document Requests. The undersigned counsel received no response. Judgment Debtor has still refused to make the required discovery responses.

Federal Rule 37(a) provides that “[o]n notice to other parties and all affected persons, a party may move for an order compelling disclosure or discovery.” F.R.C.P. 37(a). Federal Rule 37(a)(3)(B) provides that a motion to compel can be made if “a party fails to answer an interrogatory submitted under Rule 33” or “a party fails to produce documents . . . as requested under Rule 34.” F.R.C.P. 37(a)(3)(B). In this case, Judgment Debtor has failed to respond to the Interrogatories and Document Requests and an Order compelling discovery should be issued. Moreover, Aspiration is entitled to its attorneys’ fees and costs for filing and prosecution of this Motion to Compel. F.R.C.P. 37(a)(5).

Very truly yours,

A handwritten signature in black ink, appearing to read "S. Faraci", written over a horizontal line.

Stephen M. Faraci Sr.

cc: All counsel via ECF